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REMARKS

Claims 1-11 were pending in the present application. Claims 3-8, and 11 have been canceled without prejudice or disclaimer and new claims 12-15 added herein. Thus claims 1,2, 9, 10, and 12-15 are now pending in the present application. Reconsideration of the present application in view of the above amendments and the following remarks is respectfully requested.

Applicants note with appreciation acknowledgement of the claim for priority made under section 119 and notice that all certified copies of the priority documents have been received.

Applicants also note the receipt of an initialed copy of form PTO-1449, on which the examiner has indicated consideration by initialing all listed items.

Claims 1-8 and 11 stand rejected under 35 U.S.C. §112 second paragraph as being allegedly indefinite. Claims 1 and 2 are amended herein and claims 3-8 and 11 are cancelled and will not be discussed.

Claims 1 and 2 have been amended to more clearly recite the claimed method, for example, with regard to the successive exposures of photosensitive members. Applicant submits that since one of ordinary skill in the art would clearly understand what is being claimed, the rejection of claims 1 and 2 should be reconsidered and withdrawn.

Claims 7-10 stand rejected under 35 U.S.C. §102(b) as being allegedly anticipated by Hattori et al, U.S. Patent No. 6,111,670, (hereinafter "Hattori"). Claims 7 and 8 are cancelled and will not be discussed, and the rejection is otherwise respectfully traversed.

With regard to claim 9, Applicant first notes that according to the present invention, a reference light side mirror is arranged in such a way that the photosensitive member is exposed by the reference light from the light source. By providing reference beam side mirror 31, the lower portion of reference beam 41 reaches the lowest portion of the photosensitive member 51

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or 52 as shown in FIG 1A and FIG 1B. It should be noted that the length of mirror 31 depends on the position of the photosensitive member.

In the discussion accompanying the rejection, the Examiner fails to specifically assert that the applied reference discloses the features of the claims. Further while indicating the rejection is with regard to claims 7-10, claims 5, 6, and 10 are specifically addressed. Applicant submits that no specific allegation is made with regard to the features of claim 9 and Applicants contend that the applied art fails to disclose features of claim 9 in the manner claimed. Hattori notably fails to disclose and it is not alleged that Hattori discloses, for example, the claimed means for successively holding a plurality of photosensitive members at positions corresponding to the positions for subsequent arrangement and integration, and a plurality of mirrors to be successively arranged to extend toward said plurality of photosensitive members at an end portion of said light diffuser and to be arranged at a side of the light source such that a reference beam generated from the light source is not shielded by successive ones of the plurality of mirrors when each of the successive ones are arranged at the end portion of the light diffuser. Further in accordance with the claimed invention, one of the plurality of mirrors is replaced with another of the plurality of mirrors having a different length of extension from the light diffuser in accordance with a position of each of the plurality of photosensitive members to be exposed individually thereby to expose one of the plurality of photosensitive members.

Accordingly a *prima facie* case of anticipation has not been established in that the applied reference fails to disclose all the claimed features as required. It is respectfully requested therefore that the rejection of claim 9 be reconsidered and withdrawn.

Claim 10, by virtue of depending from claim 9, is believed allowable for at least the reasons set forth hereinabove with regard to claim 9. It is respectfully requested that the rejection of claim 10 be reconsidered and withdrawn.

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Claims 3-11 stand rejected under 35 U.S.C. 103 (a) as being allegedly unpatentable over Hattori in view of Takada, et al., EP 828202 (hereinafter "Takada"). Claims 3-8, and 11 are cancelled herein and will not be discussed, and the rejection is otherwise respectfully traversed.

With regard to claim 9, it should first be noted that no evidence has been provided to show that one of ordinary skill in the art would have been motivated to combine the references to arrive at the claimed invention. Specifically, Hattori deals with reducing visible color shifts associated with failure to provide exposure in a horizontal plane while, Takada deals with blockage caused by a light diffusing body. Applicant submits that one of ordinary skill in the art would not have been motivated to combine Hattori and Takada since they deal with entirely different problems.

Regardless however of the lack of evidence showing a motivation to combine the teachings, Hattori, and thus the applied art combination, necessarily fails to teach or suggest the claimed features for at least the reasons set forth herein above, e.g. the applied art combination, based, for example, on the deficiencies in Hattori, fails to teach or suggest the claimed means for successively holding a plurality of photosensitive members at positions corresponding to the positions for subsequent arrangement and integration, and a plurality of mirrors to be successively arranged to extend toward said plurality of photosensitive members at an end portion of said light diffuser and to be arranged at a side of the light source such that a reference beam generated from the light source is not shielded by successive ones of the plurality of mirrors when each of the successive ones are arranged at the end portion of the light diffuser, one of the plurality of mirrors is replaced with another of the plurality of mirrors having a different length of extension from the light diffuser in accordance with a position of each of the plurality of photosensitive members to be exposed individually thereby to expose one of the plurality of photosensitive members.

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Accordingly a *prima facie* case of obviousness has not been established in that no evidence has been provided to show that the combination was motivated and the applied art combination still fails to teach or suggest all the claimed features as required. It is respectfully requested therefore that the rejection of claim 9 be reconsidered and withdrawn.

Claim 10, by virtue of depending from claim 9, is believed allowable for at least the reasons set forth hereinabove with regard to claim 9. It is respectfully requested that the rejection of claim 10 be reconsidered and withdrawn.

Claims 3-11 stand rejected under 35 U.S.C. 103 (a) as being allegedly unpatentable over Hattori in view of Takada, and further in view of Ori, US 2001/0005317. Claims 3-8, and 11 are cancelled herein and will not be discussed, and the rejection is otherwise respectfully traversed.

For at least the reasons set forth herein above, no evidence has been provided to show that the applied art combination is properly motivated, and, considering the deficiencies in the teachings of Hattori, which are not cured by the addition of Ori, the applied art combination still fails to teach or suggest significant features of claim 9.

Accordingly a *prima facie* case of obviousness has not been established in that no evidence has been provided to show that the combination was motivated and the applied art combination still fails to teach or suggest all the claimed features as required. It is respectfully requested therefore that the rejection of claim 9 be reconsidered and withdrawn.

Claim 10, by virtue of depending from claim 9, is believed allowable for at least the reasons set forth hereinabove with regard to claim 9. It is respectfully requested that the rejection of claim 10 be reconsidered and withdrawn.

The indication of allowability with regard to claims 1 and 2 is noted with appreciation. Claims 1 and 2 are amended herein to address issues under 35 U.S.C. section 112, second paragraph as noted above. Applicant now believes claims 1 and 2 are in condition for allowance.

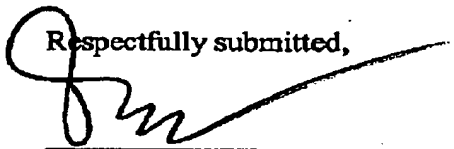
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New claims 12-15, generally corresponding to claims 1, 2, 9, and 10 are submitted to provide additional coverage and contain features believed allowable for at least the reasons set forth herein above. Favorable consideration is hereby requested.

In view of the foregoing, the applicants respectfully submit that this application is in condition for allowance and a timely notice to that effect is respectfully requested. If questions relating to patentability remain, the examiner is invited to contact the undersigned by telephone.

Please charge any unforeseen fees that may be due to Deposit Account No. 50-1147.

Respectfully submitted,


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